

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. 03- |
| v. | : | DATE FILED: _____ |
| EDWARD HAMPTON a/k/a "Man" | : | VIOLATION: 18 U.S.C. § 371 (Conspiracy to pass counterfeit currency -1 count) |

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or around August 1998 to in or around
November 1998, at various locations in the Eastern District
of Pennsylvania, the defendant,

EDWARD HAMPTON,
a/k/a "Man",

conspired and agreed, together with others known and unknown
to the United States Attorney, to commit offenses against
the United States; that is, to: knowingly possess, pass,
utter or publish counterfeit obligations of the United
States, that is counterfeit currency with intent to defraud,
in violation of Title 18 United States Code, Section 472.

MANNER AND MEANS

It was a part of the conspiracy that:

1. Ricky Scott Nelson, a/k/a "Scottie", a/k/a "Big Roachie", a/k/a "Roachie", a/k/a "Shamir", charged elsewhere, manufactured counterfeit United States Currency (Federal Reserve Notes or "FRNs") in one hundred dollar and fifty dollar denominations by altering genuine one and five dollar FRNs.

2. Ricky Scott Nelson selectively bleached genuine one and five dollar FRNs to remove the denomination amounts, protecting some of the genuine images such as the Treasury Seal, Federal Reserve Seal, Federal Reserve Bank numbers/indicators, signatures, check letter/face plate number, check letter/quadrant, series, serial numbers, "Washington, D.C." and "THIS NOTE IS LEGAL TENDER FOR ALL DEBTS, PUBLIC AND PRIVATE". Defendant Ricky Scott Nelson then used these protected genuine images as part of the counterfeit notes.

3. Ricky Scott Nelson also altered genuine \$50 and \$100 FRNs by obliterating genuine images of those items that were not bleached on the genuine one and five dollar FRNs, such as the Treasury Seal, Federal Reserve Seal, Federal Reserve Bank numbers/indicators, signatures, check letter/quadrant, series. He then copied the remaining

images from the \$50 FRN and \$100 FRN, including the denomination amount, on the genuine paper of the bleached one and five dollar FRNs.

4. Ricky Scott Nelson after manufacturing the counterfeit \$100 and \$50 FRNs, sold, exchanged, transferred and delivered them to various people, including Kenneth Hampton, charged elsewhere, and defendant EDWARD HAMPTON.

5. Ricky Scott Nelson charged forty to fifty percent of the face value of the counterfeit currency which he was paid either at the time that he transferred or delivered the counterfeit or after the counterfeit currency was passed.

6. Kenneth Hampton, and others known and unknown to the United States Attorney, obtained the assistance of yet other people to pass or utter the counterfeit FRNs created by Ricky Scott Nelson.

7. Kenneth Hampton, and others known and unknown to the United States Attorney, supplied these other people with counterfeit FRNs and instructed them on how best to pass counterfeit currency to unknowing victims.

8. Defendant EDWARD HAMPTON passed counterfeit currency that he received from Kenneth Hampton and Ricky

Scott Nelson.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere.

1. On or about August 10, 1998 Defendant EDWARD HAMPTON obtained \$1,000 in counterfeit \$100 FRNs from defendant Ricky Scott Nelson.

2. On or about August 13, 1998 defendant EDWARD HAMPTON obtained \$1,000 in counterfeit \$100 FRNs from defendant Ricky Scott Nelson.

3. On or about August 14, 1998, defendant EDWARD HAMPTON and his relative, Terrell Hampton, charged elsewhere, went to the Willow Grove Mall, Montgomery County, Pennsylvania with approximately \$1000 in counterfeit \$100 FRNs to pass.

4. On or about August 14, 1998 defendant EDWARD HAMPTON paid for merchandise at the Kid's Gap Store, Willow Grove Mall, Montgomery County, Pennsylvania with a counterfeit \$100 FRN received from Ricky Scott Nelson.

5. On or about August 14, 1998 defendant EDWARD

HAMPTON attempted to pay for merchandise at the Children's Place Store, Willow Grove Mall, Montgomery County, Pennsylvania, with a counterfeit \$100 FRN received from Ricky Scott Nelson.

6. On or about November 2, 1998, defendant EDWARD HAMPTON passed a counterfeit \$100 FRN at the Gulph Mills Sunoco gas station.

7. On or about November 4, 1998, defendant EDWARD HAMPTON passed a counterfeit \$50 FRN at the Shop & Save Store, Lower Providence Township, Montgomery County, Pa.

PATRICK L. MEEHAN
United States Attorney